

May 3, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554
Re: CC Docket No. 02-33
Notice of Proposed Rulemaking (FCC 02-42)

Dear Ms. Dortch:

As President of a small internet company planning to provide high-speed wireless internet service in the Topeka Kansas area, I am writing to voice my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA").

Also, unless the USF is allowed to be used by companies like ourselves, I would also ask the Commission not impose the burdens of USF on smaller license-exempt providers of wireless broadband services.

We are a small local business with a staff of just 3 and with in the next 4 months we will be able to begin delivery of broadband service to homes and small businesses in the Capital of Kansas. SBC is the local last mile provider and despite heavy saturation of Central Offices, at least 60% of homes and offices still cannot qualify for DSL.

They will claim that they can't afford to expand service because they have to permit access to their networks, however by mandate, they do receive payment covering their costs and a mutually agreed on profit margin and are already able to tap the USF revenue pool.

I must also point out that on a regular basis. SBC offers DSL including access to the internet/backbone for less than they will provide DSL local loop only to resellers and ISP's like us.

Cable can reach many of these areas however their level of service can have much to be desired.

Despite our small size and limited funding we have entered into agreements that will allow us to cover a 110 square mile area by the end of Q3 2002.

We will be able to provide broadband service to schools, hospitals, governments and non-profit organizations, giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents.

We therefore are troubled about the possibility that the Commission will subject us to USF reporting and contribution obligations. Indeed, I believe cost of complying with USF reporting obligations would be an unbearable burden considering the additional costs associated with explaining USF charges to subscribers and dealing with any subsequent subscriber complaints.

While I generally support the broad objectives of universal service, I do not believe it is equitable to hinder the growth and survival of wireless broadband and at the same time actively support “copper wire” services and my competition.

We are not an ILEC or a cable MSO, we cannot afford the additional personnel or administrative expense necessary for USF compliance especially when we would be taking money out of our pockets and putting it into the pockets of the ILEC.

The founding of this country was sparked by taxation with out representation. It is unfair and most likely legally improper to tax our industry to provide services that we can deliver (I believe better, faster and less expensively) while we will not be permitted to access these funds to provide these same services.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller license-exempt providers of broadband service unless we are able to be placed on an equal footing regarding access to these same funds.

Thank you for your attention.
Regards,

Greg Palmer
CEO
YourInternetService